



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: The Commission

FROM: Thomasenia P. Duncan
General Counsel

Kathleen Guith
Deputy Associate General Counsel for Enforcement

BY: Susan L. Lebeaux *SL*
Assistant General Counsel

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Attorney

SUBJECT: MUR 5955 (Valdez) – Supplement to General Counsel's Report #2

General Counsel's Report #2 dated March 3, 2010 is on circulation to the Commission with a voting deadline of March 17, 2010. On page 13, footnote 2 of that Report, we noted our unsuccessful attempts to contact Dr. Pedram Salimpour, who Dr. Valdez identified as the individual who transmitted Dr. Valdez's reimbursements to two of the conduits. On March 10, 2010, Dr. Salimpour contacted us through his counsel and agreed to an interview. In addition, on March 9, 2010, we received a letter from Dr. Valdez's counsel, offering us contact information for Andre Galvan, who she understood had information corroborating Dr. Valdez's recollection of the facts in issue in this matter.

On March 12, 2010, we conducted separate interviews with Dr. Salimpour and Andre Galvan. Dr. Salimpour could not recollect forwarding personal checks from Dr. Valdez to others, noting only that he may have delivered an envelope or package, but he did not know its contents and could not remember the recipients. Mr. Galvan, a former WellPoint employee who did not go to the conference or fundraiser in Washington, D.C., related a conversation he had approximately a month later with Kenny Deng; Dr. Valdez has stated that Mr. Deng solicited the conduits and told them that Dr. Valdez would reimburse their contributions without consulting Dr. Valdez. Mr. Galvan could not corroborate Dr. Valdez's recollection of the facts, however. Mr. Galvan stated that Kenny Deng told him he, Deng, might have done something wrong, and Galvan thought this admission related to the events in question. Nevertheless, he did not recall that Kenny Deng explicitly told him that he had approached other WellPoint employees about making political contributions and receiving reimbursement from Dr. Valdez without Dr. Valdez's consent. Thus, neither of these interviews produced information that changes the analysis or recommendations in the Report.

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